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HARRY F. COLE

TELECOPIER
(202) 833-3084

June 30, 1994

BY MESSENGER

Federal Communications Commission
Mass Media Services
P.O. Box 358165
c/o Mellon Bank
Three Mellon Bank Center
525 William Penn Way
27th Floor, Room 153-2713
Pittsburgh, Pennsylvania 15251-5165

MM 99-153

Gentlemen and Mesdames:

Submitted herewith in triplicate on behalf of Adams Communications Corporation is an application (FCC Form 301) for a construction permit for a new commercial television station to operate on Channel 51 in Reading, Pennsylvania. Please note that this application, which is being filed pursuant to Section 73.3516(e) of the Commission's Rules, is mutually exclusive with the pending application for renewal of the license of Station WTVE(TV), Reading, Pennsylvania.

Also submitted herewith is a check, payable to the Federal Communications Commission, in the amount of Two Thousand Five Hundred Thirty-Five Dollars (\$2,535.00) in payment of the filing fee specified in Section 1.1104 of the Commission's Rules.

Also submitted herewith is an additional copy of the application. Please stamp that copy to indicate your receipt of these materials, and provide it to the messenger delivering these materials for return to me.

Thank you for your attention to this matter. Please call me if you have any questions about this matter.

Sincerely,


Harry F. Cole

Counsel for Adams Communications
Corporation

Approved by OMB
3060-0027
Expires 6/30/95

FCC 301

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FOR
FCC
USE
ONLY

99-153
ORIGINAL

**APPLICATION FOR CONSTRUCTION PERMIT
FOR COMMERCIAL BROADCAST STATION**

FOR COMMISSION USE ONLY

FILE NO.

BECT-940630KG

Section I - GENERAL INFORMATION

1. APPLICANT NAME

ADAMS COMMUNICATIONS CORPORATION

MAILING ADDRESS (Line 1) (Maximum 35 characters)

c/o Robert L. Haag

MAILING ADDRESS (Line 2) (If required) (Maximum 35 characters)

155 North Michigan Avenue, Suite 725

CITY

Chicago

STATE OR COUNTRY (If foreign address)

Illinois

ZIP CODE

60601

TELEPHONE NUMBER (Include area code)

312-819-0505

CALL LETTERS

OTHER FCC IDENTIFIER (IF APPLICABLE)

FOR MAILING THIS APPLICATION, SEE INSTRUCTIONS FOR SECTION 1 - GENERAL INFORMATION B.

2. A. Is a fee submitted with this application?

☒ Yes ☐ No

B. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1112) and go to Question 3.

☐ Governmental Entity

☐ Noncommercial educational licensee

C. If Yes, provide the following information:

Enter in Column (A) the correct Fee Type Code for the service you are applying for. Fee Type Codes may be found in the "Mass Media Services Fee Filing Guide." Column (B) lists the Fee Multiple applicable for this application. Enter in Column (C) the result obtained from multiplying the value of the Fee Type Code in Column (A) by the number listed in Column (B).

	(A) FEE TYPE CODE	(B) FEE MULTIPLE (if required)	(C) FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	FOR FCC USE ONLY									
(1)	<table border="1"><tr><td>M</td><td>V</td><td>T</td></tr></table>	M	V	T	<table border="1"><tr><td>0</td><td>0</td><td>0</td><td>1</td></tr></table>	0	0	0	1	<table border="1"><tr><td>\$ 2,535.00</td></tr></table>	\$ 2,535.00	<table border="1"><tr><td></td></tr></table>	
M	V	T											
0	0	0	1										
\$ 2,535.00													

To be used only when you are requesting concurrent actions which result in a requirement to list more than one Fee Type Code.

	(A)	(B)	(C)	FOR FCC USE ONLY									
(2)	<table border="1"><tr><td></td><td></td><td></td></tr></table>				<table border="1"><tr><td>0</td><td>0</td><td>0</td><td>1</td></tr></table>	0	0	0	1	<table border="1"><tr><td>\$</td></tr></table>	\$	<table border="1"><tr><td></td></tr></table>	
0	0	0	1										
\$													

ADD ALL AMOUNTS SHOWN IN COLUMN C, LINES (1) THROUGH (2), AND ENTER THE TOTAL HERE. THIS AMOUNT SHOULD EQUAL YOUR ENCLOSED REMITTANCE.

TOTAL AMOUNT REMITTED
WITH THIS APPLICATION

\$ 2,535.00

FOR FCC USE ONLY

3. This application is for: (check one box)

☐ AM

☐ FM

☒ TV

(b) Channel No. or Frequency

51

(b) Principal
Community

City

Reading

State

PA

Section I - GENERAL INFORMATION (Page 2)

(c) Check one of the following boxes:

☒

Application for NEW station

☐

MAJOR change in licensed facilities; call sign: _____

☐

MINOR change in licensed facilities; call sign: _____

☐

MAJOR modification of construction permit; call sign: _____

File No. of construction permit: _____

☐

MINOR modification of construction permit; call sign: _____

File No. of construction permit: _____

☐

AMENDMENT to pending application; Application file number: _____

NOTE: It is not necessary to use this form to amend a previously filed application. Should you do so, however, please submit only Section I and those other portions of the form that contain the amended information.

4. Is this application mutually exclusive with a renewal application?

☒

Yes

☐

No

If Yes, state:

Call letters	Community of License	
	City	State
WTVE	Reading	PA

Section II - LEGAL QUALIFICATIONS

Name of Applicant

ADAMS COMMUNICATIONS CORPORATION

1. Applicant is: (check one box below)

- ☐ Individual ☐ General partnership ☒ For-profit corporation
☐ Other ☐ Limited partnership ☐ Not-for-profit corporation

2. If the applicant is an unincorporated association or a legal entity other than an individual, partnership, or corporation, describe in an Exhibit the nature of the application.

Exhibit No.

Does Not Apply

NOTE: The terms "applicant," "parties to this application," and "non-party equity owners in the applicant" are defined in the instructions for Section II of this form. Complete information as to each "party to this application" and each "non-party equity owner in the applicant" is required. If the applicant considers that to furnish complete information would pose an unreasonable burden, it may request that the Commission waive the strict terms of this requirement with appropriate justification.

3. If the applicant is not an individual, provide the date and place of filing of the applicant's enabling charter (e.g., a limited partnership must identify its certificate of limited partnership and a corporation must identify its articles of incorporation by date and place of filing):

Date November 23, 1993 Place Boston, Massachusetts

In the event there is no requirement that the enabling charter be filed with the state, the applicant shall include the enabling charter in the applicant's public inspection file. If, in the case of a partnership, the enabling charter does not include the partnership agreement itself, the applicant shall include a copy of the agreement in the applicant's public inspection file.

4. Are there any documents, instruments, contracts or understandings (written or oral), other than instruments identified in response to Question 3 above, relating to future ownership interests in the applicant, including but not limited to, insulated limited partnership shares, nonvoting stock interests, beneficial stock ownership interests, options, rights of first refusal, or debentures?

☐ Yes ☒ No

If Yes, submit as an Exhibit all such written documents, instruments, contracts, or understandings, and provide the particulars of any oral agreement.

Exhibit No.

Does Not Apply

5. Complete, if applicable, the following certifications:

(a) Applicant certifies that no limited partner will be involved in any material respect in the management or operation of the proposed station.

☐ Yes ☐ No

See Exhibit 1

If No, applicant must complete Question 6 below with respect to all limited partners actively involved in the media activities of the partnership.

(b) Does any investment company (as defined in 15 U.S.C. Section 80 a-31), insurance company, or trust department of any bank have an aggregated holding of greater than 5% but less than 10% of the outstanding votes of the applicant?

☐ Yes ☒ No

If Yes, applicant certifies that the entity holding such interest exercises no influence or control over the applicant, directly or indirectly, and has no representatives among the officers and directors of the applicant.

☐ Yes ☐ No

Does Not Apply

Section II - LEGAL QUALIFICATIONS (Page 2)

6. List the applicant, parties to the application and non-party equity owners in the applicant. Use one column for each individual or entity. Attach additional pages if necessary.

(Read carefully - The numbered items below refer to line numbers in the following table.)

a. Name and residence of the applicant and, if applicable, its officers, directors, stockholders, or partners (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and partners.

b. Citizenship.

c. Office or directorship held.

d. Number of shares or nature of partnership interests.

e. Number of votes.

f. Percentage of votes.

NOTE: Radio Applicants ONLY: Radio applicants need not respond to subparts g and h of the table. Instead, proceed and respond to Questions 7, 8 and 9, Section II below.

g. Other existing attributable interests in any broadcast station, including the nature and size of such interests.

h. All other ownership interests of 5% or more (whether or not attributable), as well as any corporate officership or directorship, in broadcast, cable, or newspaper entities in the same market or with overlapping signals in the same broadcast service, as described in 47 C.F.R. Section 73.3555 and 76.501, including the nature and size of such interests and the positions held.

a.	Adams Communications Corporation c/o Robert L. Haag Robert L. Haag & Company Suite 725 155 North Michigan Avenue Chicago, Illinois 60601	Robert L. Haag c/o Robert L. Haag & Company Suite 725 155 North Michigan Avenue Chicago, Illinois 60601	Howard N. Gilbert Holleb & Coff Suite 4100 55 East Monroe Street Chicago, Illinois 60603
b.		U.S.	U.S.
c.		President, Director	Vice President, Secretary, Director
d.		160	100
e.		160	100
f.		18.5%	11.6%
g.		None	None
h.		None	None

Section II - LEGAL QUALIFICATIONS (Page 2)

6. List the applicant, parties to the application and non-party equity owners in the applicant. Use one column for each individual or entity. Attach additional pages if necessary.

(Read carefully - The numbered items below refer to line numbers in the following table.)

a. Name and residence of the applicant and, if applicable, its officers, directors, stockholders, or partners (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and partners.

b. Citizenship.

c. Office or directorship held.

d. Number of shares or nature of partnership interests.

e. Number of votes.

f. Percentage of votes.

NOTE: Radio Applicants ONLY: Radio applicants need not respond to subparts g and h of the table. Instead, proceed and respond to Questions 7, 8 and 9, Section II below.

g. Other existing attributable interests in any broadcast station, including the nature and size of such interests.

h. All other ownership interests of 5% or more (whether or not attributable), as well as any corporate officership or directorship, in broadcast, cable, or newspaper entities in the same market or with overlapping signals in the same broadcast service, as described in 47 C.F.R. Section 73.355 and 76.501, including the nature and size of such interests and the positions held.

a.	Robert L. Haag 1994 Family Limited Partnership c/o Robert L. Haag Suite 725 155 North Michigan Avenue Chicago, Illinois 60601	Howard N. Gilbert 1994 Family Limited Partnership c/o Howard N. Gilbert Holleb & Coff Suite 4100 55 East Monroe Street Chicago, Illinois 60603	Wayne J. Fickinger 1244 Forest Glen Drive So. Winnetka, Illinois 60093
b.	U.S.	U.S.	U.S.
c.	--	--	Vice President, Director, Treasurer
d.	200	50	100
e.	200	50	100
f.	23.1%	5.8%	11.6%
g.	None	None	None
h.	None	None	None

Section II - LEGAL QUALIFICATIONS (Page 2)

6. List the applicant, parties to the application and non-party equity owners in the applicant. Use one column for each individual or entity. Attach additional pages if necessary.

(Read carefully - The numbered items below refer to line numbers in the following table.)

a. Name and residence of the applicant and, if applicable, its officers, directors, stockholders, or partners (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and partners.

b. Citizenship.

c. Office or directorship held.

d. Number of shares or nature of partnership interests.

e. Number of votes.

f. Percentage of votes.

NOTE: Radio Applicants ONLY: Radio applicants need not respond to subparts g and h of the table. Instead, proceed and respond to Questions 7, 8 and 9, Section II below.

g. Other existing attributable interests in any broadcast station, including the nature and size of such interests.

h. All other ownership interests of 5% or more (whether or not attributable), as well as any corporate officership or directorship, in broadcast, cable, or newspaper entities in the same market or with overlapping signals in the same broadcast service, as described in 47 C.F.R. Section 73.355 and 76.501, including the nature and size of such interests and the positions held.

a.	Manfred Steinfeld Shelby Williams Industries, Inc. 1348 Merchandise Mart Chicago, Illinois 60654	A. R. Umans RHQ/Spacemaster Corporation 1400 North 25th Avenue Melrose Park, Illinois 60160	Calvin I. Leibovitz Illinois Footwear Company 1003 Commerce Court Buffalo Grove, Illinois 60089
b.	U.S.	U.S.	U.S.
c.	Director	Vice President, Director	--
d.	75	75	15
e.	75	75	15
f.	8.7%	8.7%	1.7%
g.	None	None	None
h.	None	None	None

Section II - LEGAL QUALIFICATIONS (Page 2)

6. List the applicant, parties to the application and non-party equity owners in the applicant. Use one column for each individual or entity. Attach additional pages if necessary.

(Read carefully - The numbered items below refer to line numbers in the following table.)

a. Name and residence of the applicant and, if applicable, its officers, directors, stockholders, or partners (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and partners.

b. Citizenship.

c. Office or directorship held.

d. Number of shares or nature of partnership interests.

e. Number of votes.

f. Percentage of votes.

NOTE: Radio Applicants ONLY: Radio applicants need not respond to subparts g and h of the table. Instead, proceed and respond to Questions 7, 8 and 9, Section II below.

g. Other existing attributable interests in any broadcast station, including the nature and size of such interests.

h. All other ownership interests of 5% or more (whether or not attributable), as well as any corporate officership or directorship, in broadcast, cable, or newspaper entities in the same market or with overlapping signals in the same broadcast service, as described in 47 C.F.R. Section 73.3555 and 76.501, including the nature and size of such interests and the positions held.

a.	Talmadge Hill 412 Randolph Street Oak Park, Illinois 60302	Elinor Woron One Longfellow Place #3410 Boston, Massachusetts 02114	Milton Podolsky Podolsky & Associates, Ltd. 1 Westbrook Corporate Center Westchester, Illinois 60153
b.	U.S.	U.S.	U.S.
c.	--	--	--
d.	30	10	50
e.	30	10	50
f.	3.4%	1.1%	5.8%
g.	None	None	None
h.	None	None	None

Section II - LEGAL QUALIFICATIONS (Page 3)

RADIO APPLICANTS ONLY NEED TO RESPOND TO QUESTIONS 7, 8 AND 9.

7. Does the applicant, or any party to the application, own, or have an attributable interest in: (a) any AM, FM or TV station; or (b) a daily newspaper in the same market(s) as the station(s) being proposed?

☐ Yes ☐ No
Does Not Apply
(TV applicant)

8. Does the applicant, or any party to the application, broker more than 15 percent of the broadcast hours per week of any AM or FM station in a market in which the applicant, or party to the application, has an attributable interest in any AM or FM station? See 47 C.F.R. Section 73.3555(a) for definition of "radio market."

☐ Yes ☐ No
Does Not Apply
(TV applicant)

If the answer to 7 or 8 is Yes, set forth in an Exhibit, name of party having interest; nature of the interest; call letters and location of stations involved; and identification of newspaper, where applicable.

Exhibit No.

Does Not Apply
(TV applicant)

9. Does the principal community service contour (predicted or measured 5 mV/m groundwave contour for AM; predicted 3.16 mV/m contour for FM) of any AM or FM station being proposed overlap the principal community service contour of:

(a) an AM or FM station which is directly or indirectly owned, operated or controlled by the applicant or any party to the application; or

☐ Yes ☐ No
Does Not Apply
(TV applicant)

(b) an AM or FM station at which more than 15 percent of the broadcast time per week is brokered by the applicant or any party to the application?

☐ Yes ☐ No
Does Not Apply
(TV applicant)

If the answer to (a) or (b) is Yes, do you certify that the ownership interests which will result from grant of the application(s) comply with 47 C.F.R. Section 73.3555(a), or that appropriate waivers of that section are herein sought?

☐ Yes ☐ No
Does Not Apply
(TV applicant)

If Yes, attach a separate Exhibit containing the market and audience information necessary to demonstrate compliance.

Exhibit No.

Does Not Apply
(TV applicant)

Note: With reference to the Radio Contour Overlap Rule of 47 C.F.R. Section 73.3555(a), the applicant's Exhibit must include: (i) a map that clearly identifies, by relevant contours, the location and geographic coverage of the market or markets involved; (ii) the number of commercial AM and FM stations counted as being in the market or markets, including a map that shows the principal community contours of the stations that define the market or markets and the principal community contours of all commercial stations intersecting with the principal community contours of these stations; (iii) for markets with 15 or more commercial radio stations, a combined audience share figure, the basis and/or source material for this figure, and the results and qualification of any commissioned audience survey or alternative showing used; and (iv) the call letters and locations of all stations in the market or markets that are, or are proposed to be, commonly owned, operated or controlled, including any AM or FM station in the market for which the applicant or any party to the application brokers more than 15 percent of that station's broadcast time per week.

Section 11 - LEGAL QUALIFICATIONS (Page 4)

10. Does the applicant, or any party to the application, have a petition to migrate to the expanded band (1605-1705 (kHz) or a permit or license either in the existing band or expanded band that is held in combination with the AM facility proposed to be modified herein?

☐ Yes ☒ No

If Yes, provide particulars as an Exhibit.

Exhibit No.

Does Not Apply

11. Does the applicant, any party to the application or any non-party equity owner in the applicant have, or have they had, any interest in:

(a) a broadcast station, or pending broadcast station application before the Commission?

☐ Yes ☒ No

(b) a broadcast application which has been dismissed with prejudice by the Commission?

☒ Yes ☐ No

(c) a broadcast application which has been denied by the Commission?

☐ Yes ☒ No

(d) a broadcast station, the license of which has been revoked?

☐ Yes ☒ No

(e) a broadcast application in any pending or concluded Commission proceeding which left unresolved character issues against the applicant?

☐ Yes ☒ No

If the answer to any of the questions in (a)-(e) above is Yes, state in an Exhibit the following information:

Exhibit No.
2

(1) Name of party having interest;

(2) Nature of interest or connection, giving dates;

(3) Call letters of stations or file number of application or docket; and

(4) Location.

12. (a) Are any of the parties to the application or non-party equity owners in the applicant related (as husband, wife, father, mother, brother, sister, son or daughter) to each other?

☒ Yes ☐ No

(b) Does any member of the immediate family (i.e., husband, wife, father, mother, brother, sister, son or daughter) of any party to the application or non-party equity owner in the applicant have any interest in or connection with any other broadcast station, pending broadcast application or newspaper in the same area (see Section 73.355(c)) or, in the case of a television station applicant only, a cable television system in the same area (see Section 76.501(a))?

☐ Yes ☒ No

If the answer to (a) or (b) above is Yes, attach an Exhibit giving full disclosure concerning the persons involved, their relationship, the nature and extent of such interest or connection, the file number of such application, and the location of such station or proposed station.

Exhibit No.
1

13. State in an Exhibit any interest the applicant or any party to this application proposes to divest in the event of a grant of this application.

Exhibit No.

Does Not Apply

Section 11 - LEGAL QUALIFICATIONS (Page 5)

OTHER MASS MEDIA INTERESTS

14. (a) Do individuals or entities holding nonattributable interests of 5% or more in the applicant have an attributable ownership interest or corporate officership or directorship in a broadcast station, newspaper or CATV system in the same area? (See Instruction C to Section 11.)

☐ Yes ☒ No

(b) Does any member of the immediate family (i.e., husband, wife, father, mother, brother, sister, son or daughter) of an individual holding a nonattributable interest of 5% or more in the applicant have any interest in or connection with any other broadcast station, pending broadcast application, newspaper in the same area (see Section 73.3555(c)), or, in the case of a television station applicant only, a cable television system in the same area (see Section 76.507(a))?

☐ Yes ☒ No

If the answer to (a) and/or (b) above is Yes, attach an Exhibit giving a full disclosure concerning the persons involved, their relationship, the nature and extent of such interest or connection, the file number of such application, and the location of such station or proposed station.

Exhibit No.

Does Not Apply

CITIZENSHIP AND OTHER STATUTORY REQUIREMENTS

15. (a) Is the applicant in violation of the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments? (See Instruction D to Section 11.)

☐ Yes ☒ No

(b) Will any funds, credits or other financial assistance for the construction, purchase or operation of the station(s) be provided by aliens, foreign entities, domestic entities controlled by aliens, or their agents?

☐ Yes ☒ No

If the answer to (b) above is Yes, attach an Exhibit giving full disclosure concerning this assistance.

Exhibit No.

Does Not Apply

16. (a) Has an adverse finding been made or an adverse final action been taken by any court or administrative body as to the applicant, any party to this application, or any non-party equity owner in the applicant in a civil or criminal proceeding brought under the provisions of any law related to the following:

Any felony; mass media related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?

☐ Yes ☒ No

(b) Is there now pending in any court or administrative body any proceeding involving any of the matters referred to in (a) above?

☐ Yes ☒ No

If the answer to (a) and/or (b) above is Yes, attach as an Exhibit a full disclosure of the persons and matters involved, including an identification of the court or administrative body and the proceeding (by dates and file numbers), a statement of the facts upon which the proceeding is or was based or the nature of the offense alleged or committed, and a description of the current status or disposition of the matter.

Exhibit No.

Does Not Apply

SECTION III - FINANCIAL QUALIFICATIONS

NOTE: If this application is for a change in an operating facility do not fill out this section.

1. The applicant certifies that sufficient net liquid assets are on hand or that sufficient funds are available from committed sources to construct and operate the requested facilities for three months without revenue.

☒ Yes ☐ No

2. State the total funds you estimate are necessary to construct and operate the requested facility for three months without revenue.

\$ See Exhibit 3

3. Identify each source of funds, including the name, address, and telephone number of the source (and a contact person if the source is an entity), the relationship (if any) of the source to the applicant, and the amount of funds to be supplied by each source.

Source of Funds (Name and Address)	Telephone Number	Relationship	Amount
See Exhibit 3			

Section IV-A - PROGRAM SERVICE STATEMENT

Attach as an Exhibit, a brief description, in narrative form, of the planned programming service relating to the issues of public concern facing the proposed service area.

Exhibit No. 4

Section IV-B - INTEGRATION STATEMENT

Attach as an Exhibit the information required in 1. and 2. below.

Exhibit No. 5

1. List each principal of the applicant who, in the event of a grant of the application on a comparative basis, proposes to participate in the management of the proposed facility and, with respect to each such principal, state whether he or she will work full-time (minimum 40 hours per week) or part-time (minimum 20 hours per week) and briefly describe the proposed position and duties.

2. State with respect to each principal identified in response to Item 1. above, whether the applicant will claim qualitative credit for any of the following enhancement factors:

(a) Minority Status

(b) Past Local Residence

If Yes, specify whether in the community of license or service area and the corresponding dates.

(c) Female Status

(d) Broadcast Experience

If Yes, list each employer and position and corresponding dates.

(e) Daytime Preference

(f) Civic activities

If Yes, describe the activities, specify whether in the community of license or service area, and state the corresponding dates.

SECTION VI - EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

1. Does the applicant propose to employ five or more full-time employees?

☒ Yes ☐ No

If Yes, the applicant must include an EEO program called for in the separate Broadcast Equal Employment Opportunity Program Report (FCC 896-A).

SECTION VII - CERTIFICATIONS

1. Has or will the applicant comply with the public notice requirement of 47 C.F.R. Section 73.3580?

☒ Yes ☐ No

2. Has the applicant reasonable assurance, in good faith, that the site or structure proposed in Section V of this form, as the location of its transmitting antenna, will be available to the applicant for the applicant's intended purpose?

☒ Yes ☐ No

If No, attach as an Exhibit, a full explanation.

Exhibit No.

Does Not Apply

3. If reasonable assurance is not based on applicant's ownership of the proposed site or structure, applicant certifies that it has obtained such reasonable assurance by contacting the owner or person possessing control of the site or structure.

Name of Person Contacted Steve Lubas, Conestoga Telephone and Telegraph Co.

Telephone No. (include area code) 610-582-8711

Person contacted: (check one box below)

☐ Owner

☒ Owner's Agent

☐ Other (specify)

4. By checking Yes, the applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, or, in the case of a non-individual applicant (eg, corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. Section 1.2002(b).

☒ Yes ☐ No

The APPLICANT hereby waives any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

The APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations, and that all exhibits are a material part hereof and incorporated herein.

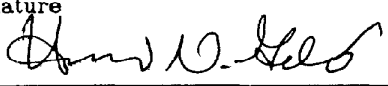
The APPLICANT represents that this application is not filed for the purpose of impeding, obstructing, or delaying determination on any other application with which it may be in conflict.

In accordance with 47 C.F.R. Section 1.65, the APPLICANT has a continuing obligation to advise the Commission, through amendments, of any substantial and significant changes in information furnished.

SECTION VII - CERTIFICATION (Page 2)

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify that the statements in this application are true and correct to the best of my knowledge and belief, and are made in good faith.

Name of Applicant ADAMS COMMUNICATION CORPORATION	Signature 
Date Jun 30, 1994	Title Vice-President

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT
AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The Commission will use the information provided in this form to determine whether grant of the application is in the public interest. In reaching that determination, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. If information requested on the form is not provided, processing of the application may be delayed or the application may be returned without action pursuant to the Commission's rules. Your response is required to obtain the requested authority.

Public reporting burden for this collection of information is estimated to vary from 72 hours 40 minutes to 347 hours 25 minutes with an average of 213 hours 32 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, can be sent to the Federal Communications Commission, Information Resources Branch, Room 416, Paperwork Reduction Project, Washington, D.C. 20554, and to the Office of Management and Budget, Paperwork Reduction Project (3060-0027), Washington, D.C. 20503.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

EXHIBIT 1

FCC Form 301, §II, ¶5

Certification Concerning Limited Partnerships

With the exception of two shareholders, all principals of Adams Communications Corporation ("Adams") are individuals. The two exceptions are the Robert L. Haag 1994 Family Limited Partnership ("Haag Family LP"), which holds 23.1% of Adams' stock, and the Howard N. Gilbert 1994 Family Limited Partnership ("Gilbert Family LP"), which holds 5.8% of Adams' stock.

The sole general partner of the Haag Family LP is Robert L. Haag, who is also an individual shareholder, officer and director of Adams. The limited partners are Mr. Haag's children, Phillip and Donna Jacquelin. As sole general partner of the Haag Family LP, Mr. Haag exercises that entity's voting rights in its Adams stock.

The sole general partner of the Gilbert Family LP is Howard N. Gilbert, who is also an individual shareholder, officer and director of Adams. The limited partners are Mr. Gilbert's grandchildren, Yachdav, Yibboneh, Eretz, Tohar and Shelev. As sole general partner of the Gilbert Family LP, Mr. Gilbert exercises that entity's voting rights in its Adams stock.

Adams hereby certifies that no limited partner of the Haag Family LP or the Gilbert Family LP will be involved in any material respect in the management or operation of the proposed station.

EXHIBIT 2

FCC Form 301, §II, ¶11

Past Broadcast Interests

Robert L. Haag, Howard N. Gilbert, Wayne J. Fickinger, A. R. Umans, Manfred Steinfeld, Milton Podolsky, Talmadge L. Hill and Calvin I. Leibovitz were all principals of Monroe Communications Corporation ("Monroe"), an applicant (File No. BPCT-821101KH) for a new television station in Chicago, Illinois. Monroe's application was granted by the Commission, see Video 44, 5 FCC Rcd 6383 (1990), recon. denied, 6 FCC Rcd 4948 (1991), but was ultimately dismissed pursuant to a settlement agreement, see Order released December 24, 1992 in MM Docket No. 83-575, Video 44, FCC 92I-097.

In addition, Messrs. Gilbert, Haag and Umans were previously principals of the licensees of Stations WGKY(AM), Charlotte, Michigan, WYGR(AM), Wyoming, Michigan, WKGN(AM), Knoxville, Tennessee, and WGLY(FM), Goulds, Florida. They have divested themselves of those interests.

EXHIBIT 3

FCC Form 301, §III, ¶1-3

Financial Qualifications

Adams Communications Corporation ("Adams") certifies that sufficient net liquid assets are on hand or that sufficient funds are available from committed sources to construct and operate the requested facilities for three months without revenue.

Based on cost estimates provided by its consultants, together with the past business experience of its principals, Adams estimates that a total of \$4,500,000 will be necessary to construct and operate the requested facility for three months without revenue. That total includes the anticipated costs of preparation and prosecution of Adams' application, as well as a "cushion" of extra funds to meet presently unanticipated expenses.

To meet this requirement, Adams intends to rely on a loan commitment from the American National Bank and Trust Company of Chicago, 33 North LaSalle Street, Chicago, Illinois 60890 (John Q. McKinnen - 312-661-5907) in the amount of \$5,000,000 (Five Million Dollars). In addition, Adams' shareholders have committed to contribute funds as necessary during the prosecution of the application.

EXHIBIT 4

FCC Form 301, §IV-A

Program Service Statement

Adams Communications Corporation ("Adams") will provide regularly scheduled news, public affairs and other nonentertainment programming (including locally-produced and locally-oriented programming and public service announcements) responsive to the needs and interests of Reading and the rest of the station's service area. In addition, Adams will monitor local needs and interests on a continuing basis. Adams will comply with all applicable Rules, Regulations and policies of the Federal Communications Commission.

EXHIBIT 5

FCC Form 301, §IV-B

In Bechtel v. FCC, 10 F.3d 875 (D.C. Cir. 1993), the United States Court of Appeals for the District of Columbia Circuit held that the Commission's policy of granting comparative credit to applicants proposing that their owners will participate in the day-to-day management of the proposed station was unlawful. Neither the Commission nor any other party to that decision sought to rehearing or certiorari by the Supreme Court, and that decision has thus become final.

In light of the Court's ruling in Bechtel, it appears that "integration" information such as that sought by FCC Form 301, Section IV-B, need not be submitted. See FCC Freezes Comparative Proceedings, 9 FCC Rcd 1055 (1994). Accordingly, Adams Communications Corporation ("Adams") is not providing any response to that section of the form. Adams reserves the right to submit additional information concerning its qualifications at such time as the Commission announces appropriate standards, consistent with the Court's opinion in Bechtel, for such qualifications.

**BROADCAST EQUAL EMPLOYMENT OPPORTUNITY
MODEL PROGRAM REPORT**

1. APPLICANT

Name of Applicant ADAMS COMMUNICATIONS CORPORATION	Address c/o Robert L. Haag 155 North Michigan Avenue, Ste. 725 Chicago, Illinois 60601
Telephone Number (include area code) 312-819-0505	

2. This form is being submitted in conjunction with:

☒ Application for Construction Permit for New Station ☐ Application for Assignment of License

☐ Application for Transfer of Control

(a) Call letters (or channel number of frequency) _____

(b) Community of License (city and state) _____

(c) Service: ☐ AM ☐ FM ☒ TV ☐ Other (Specify) _____

INSTRUCTIONS

Applicants seeking authority to construct a new commercial, noncommercial or international broadcast station, applicants seeking authority to obtain assignment of the construction permit or license of such a station, and applicants seeking authority to acquire control of an entity holding such construction permit or license are required to afford equal employment opportunity to all qualified persons and to refrain from discrimination in employment and related benefits on the basis of race, color, religion, national origin or sex. See Section 73.2080 of the Commission's Rules. Pursuant to these requirements, an applicant who proposes to employ five or more full-time employees must establish a program designed to assure equal employment opportunity for women and minority groups (that is, Blacks not of Hispanic origin, Asians or Pacific Islanders, American Indians or Alaskan Natives and Hispanics). This is submitted to the Commission as the Model EEO Program. If minority group representation in the available labor force is less than five percent (in the aggregate), a program for minority group members is not required. In such cases, a statement so indicating must be set forth in the EEO model program. However, a program must be filed for women since they comprise a significant percentage of virtually all labor forces. If an applicant proposes to employ fewer than five full-time employees, no EEO program for women or minorities need be filed.

Guidelines for a Model EEO Program and a Model EEO Program are attached.

NOTE: Check appropriate box, sign the certification below and return to FCC:

- ☐ Station will employ fewer than 5 full-time employees; therefore no written program is being submitted.
- ☒ Station will employ 5 or more full-time employees. Our Model EEO Program is attached. (You must complete all sections of this form.)

I certify that the statements made herein are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Signed and dated this 30th day of June, 19 94

Signed James D. Haag

Title Vice-President

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

GUIDELINES TO THE MODEL EEO PROGRAM

The model EEO program adopted by the Commission for construction permit applicants, assignees and transferees contains five sections designed to assist the applicant in establishing an effective EEO program for its station. The specific elements which should be addressed are as follows:

I. GENERAL POLICY

The first section of the program should contain a statement by the applicant that it will afford equal employment opportunity in all personnel actions without regard to race, color, religion, national origin or sex, and that it has adopted an EEO program which is designed to fully utilize the skills of qualified minorities and women in the relevant available labor force.

II. RESPONSIBILITY FOR IMPLEMENTATION

This section calls for the name (if known) and title of the official who will be designated by the applicant to have responsibility for implementing the station's program.

III. POLICY DISSEMINATION

The purpose of this section is to disclose the manner in which the station's EEO policy will be communicated to employees and prospective employees. The applicant's program should indicate whether it: (a) intends to utilize an employment application form which contains a notice informing job applicants that discrimination is prohibited and that persons who believe that they have been discriminated against may notify appropriate governmental agencies; (b) will post a notice which informs job applicants and employees that the applicant is an equal opportunity employer and that they may notify appropriate governmental authorities if they believe that they have been discriminated against; and (c) will seek the cooperation of labor unions, if represented at the station in the implementation of its EEO program and in the inclusion of nondiscrimination provisions in union contracts. The applicant should also set forth any other methods it proposes to utilize in conveying its EEO policy (e.g., orientation materials, on-air announcements, station newsletter) to employees and prospective employees.

IV. RECRUITMENT

The applicant should specify the recruitment sources and other techniques it proposes to use to attract qualified minority and female job applicants. Not all of the categories of recruitment sources need be utilized. The purpose of the listing is to assist the applicant in developing specialized referral sources to establish a pool of qualified minorities and women who can be contacted as job opportunities occur. Sources which subsequently prove to be nonproductive should not be relied on and new sources should be sought.

V. TRAINING

Training programs are not mandatory. Each applicant is expected to decide, depending upon its own individual situation, whether a training program is feasible and would assist in its effort to increase the available pool of qualified minority and female applicants. Additionally, the applicant may set forth any other assistance it proposes to give to students, schools or colleges which is designed to be of benefit to minorities and women interested in entering the broadcasting field. The beneficiary of such assistance should be listed, as well as the form of assistance, such as contributions to scholarships, participation in work study programs, and the like.

MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

I. GENERAL POLICY

It will be our policy to provide employment opportunity to all qualified individuals without regard to their race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It will also be our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have adopted an Equal Employment Opportunity Program which includes the following elements:

II. RESPONSIBILITY FOR IMPLEMENTATION

(Name/Title) Robert L. Haag, President

will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

III. POLICY DISSEMINATION

To assure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts will be made:

GUIDELINES TO THE MODEL EEO PROGRAM

The model EEO program adopted by the Commission for construction permit applicants, assignees and transferees contains five sections designed to assist the applicant in establishing an effective EEO program for its station. The specific elements which should be addressed are as follows:

I. GENERAL POLICY

The first section of the program should contain a statement by the applicant that it will afford equal employment opportunity in all personnel actions without regard to race, color, religion, national origin or sex, and that it has adopted an EEO program which is designed to fully utilize the skills of qualified minorities and women in the relevant available labor force.

II. RESPONSIBILITY FOR IMPLEMENTATION

This section calls for the name (if known) and title of the official who will be designated by the applicant to have responsibility for implementing the station's program.

III. POLICY DISSEMINATION

The purpose of this section is to disclose the manner in which the station's EEO policy will be communicated to employees and prospective employees. The applicant's program should indicate whether it: (a) intends to utilize an employment application form which contains a notice informing job applicants that discrimination is prohibited and that persons who believe that they have been discriminated against may notify appropriate governmental agencies; (b) will post a notice which informs job applicants and employees that the applicant is an equal opportunity employer and that they may notify appropriate governmental authorities if they believe that they have been discriminated against; and (c) will seek the cooperation of labor unions, if represented at the station, in the implementation of its EEO program and in the inclusion of nondiscrimination provisions in union contracts. The applicant should also set forth any other methods it proposes to utilize in conveying its EEO policy (e.g., orientation materials, on-air announcements, station newsletter) to employees and prospective employees.

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To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have adopted an Equal Employment Opportunity Program which includes the following elements:

II. RESPONSIBILITY FOR IMPLEMENTATION

(Name/Title) Robert L. Haag, President will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

III. POLICY DISSEMINATION

To assure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts will be made:

- ☒ The station's employment application form will contain a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, State or Federal agency if they believe they have been the victims of discrimination.
- ☒ Appropriate notices will be posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, State or Federal agency if they believe they have been the victims of discrimination.
- ☒ We will seek the cooperation of unions, if represented at the station, to help implement our EEO program and all union contracts will contain a nondiscrimination clause.
- ☐ Other (specify)

IV. RECRUITMENT

To ensure nondiscrimination in relation to minorities and women, and to foster their full consideration whenever job vacancies occur, we propose to utilize the following recruitment procedures:

- ☒ We will contact a variety of minority and women's organizations to encourage the referral of qualified minority and women applicants whenever job vacancies occur. Examples of organizations we intend to contact are:
- National Association for the Advancement of Colored People
Hispanic Center of Reading/Berks County
Pennsylvania Federation of Business and Professional Women's Clubs
Berks Community Action Program, Inc.
- ☒ In addition to the organizations noted above, which specialize in minority and women candidates, we will deal only with employment services, including State employment agencies, which refer job candidates without regard to their race, color, religion, national origin or sex. Examples of these employment referral services are:
- Mack Employment Services
Kelly Temporaries
Gage Personnel
- ☒ When we recruit prospective employees from educational institutions such recruitment efforts will include area schools and colleges with minority and women enrollments. Educational institutions to be contacted for recruitment purposes are:
- Reading Area Community College
Kutztown University
Pennsylvania State University (Reading campus)
- ☒ When we place employment advertisements with media some of such advertisements will be placed in media which have significant circulation or viewership or are of particular interest to minorities and women. Examples of media to be utilized are:
- Reading Eagle/Times
Broadcasting & Cable
- ☒ We will encourage employees to refer qualified minority and women candidates for existing and future job openings.

V. TRAINING

- ☒ Station resources and/or needs will be such that we will be unable or do not choose to institute programs for upgrading the skills of employees.
- ☐ We will provide on-the-job training to upgrade the skills of employees.
- ☐ We will provide assistance to students, schools, or colleges in programs designed to enable qualified minorities and women to compete in the broadcast employment market on an equitable basis:

School or Other Beneficiary	Proposed Form of Assistance
<hr/>	<hr/>
<hr/>	<hr/>
<hr/>	<hr/>

☐ Other (specify)

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Paperwork Reduction Act. Public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Federal Communications Commission, Information Resources Branch, Room 416, Paperwork Reduction Project, Washington, D.C. 20554, and to the Office of Management and Budget, Paperwork Reduction Project (3060-0120), Washington, D.C. 20503.

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to determine if the application requested is consistent with the public interest. The staff, consisting variously of attorneys, analysts, engineers, and applications examiners, will use the information to determine whether the application should be granted, denied, dismissed, or designated for hearing. If all the information requested is not provided, the application may be returned without action having been taken upon it or its processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to obtain the requested authority.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1980, P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

FCC Original

Engineering Exhibit

Application for Construction Permit

prepared for
Adams Communications Corporation
Reading, Pennsylvania

Channel 51 5000 kW 153 m

June 29, 1994

Suffa & Cavell, Inc.

**Consulting Engineers
10300 Eaton Place
Suite 450
Fairfax, VA 22030
(703) 591-0110**

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Engineering Exhibit

**APPLICATION FOR
CONSTRUCTION PERMIT**

prepared for

Adams Communications Corporation

Reading, Pennsylvania

Channel 51 5000 kW 153 m

Table of Contents

FCC Form	FCC Form 301, Section V-C
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Statement B	Allocation Considerations
Statement C	Interference Considerations
Figure 3	Proposed Transmitter Site
Figure 4	Predicted Coverage Contours
Statement D	Environmental Considerations
Statement E	Emergency Power

Section V-C - TV BROADCAST ENGINEERING DATA

FOR COMMISSION USE ONLY

File No. _____

ASB Referral Date _____

Referred by _____

Name of Applicant

Adams Communications Corporation

Call letters (if issued)

N/A

Purpose of Application (check appropriate box):

☒ Construct a new (main) facility

☐ Construct a new auxiliary facility

☐ Modify existing construction permit for main facility

☐ Modify existing construction permit for auxiliary facility

☐ Modify licensed main facility

☐ Modify licensed auxiliary facility

If purpose is to modify, indicate nature of change(s) by checking appropriate box(es), and specify the file number(s) of the authorization(s) affected:

☐ Antenna supporting-structure height

☐ Effective radiated power

☐ Antenna height above average terrain

☐ Frequency

☐ Antenna location

☐ Antenna system

☐ Main Studio location

☐ Other (Summarize briefly)

File Number(s) _____

1. Allocation:

Channel No.	Offset (check one)	Principal community to be served:			Zone (check one)
	<input type="checkbox"/> Plus	City	County	State	<input checked="" type="checkbox"/> I
	<input type="checkbox"/> Minus	Reading	Berks	PA	<input type="checkbox"/> II
51	<input checked="" type="checkbox"/> Zero				<input type="checkbox"/> III

2. Exact location of antenna:

- (a) Specify address, town or city, county and state. If no address, specify distance and bearing to the nearest landmark.
On Gibraltar Hill, approx. 1 km west of Seyfert, approx. 1.4 km SSE of Ridgewood, 1.34 km SSE of the Route 176-Route 724 intersection, Berks County, Pennsylvania
- (b) Geographical coordinates (to nearest second). If mounted on element of an AM array, specify coordinates of center of array. Otherwise, specify tower location. Specify South Latitude and East Longitude where applicable; otherwise, North Latitude and West Longitude will be presumed.

Latitude	40	°	17	'	15	"	Longitude	75	°	53	'	45	"
----------	----	---	----	---	----	---	-----------	----	---	----	---	----	---

3. Is the supporting structure the same as that of another station(s) or proposed in another pending application(s)? ☒ Yes ☐ No

If Yes, give call letter(s) or file number(s) or both.

KUS-323, KGI-769, WNRH-704

If proposal involves a change in height of an existing structure, specify existing height above ground level, including antenna, all other appurtenances, and lighting, if any.

No change in overall height proposed

SECTION V-C - TV BROADCAST ENGINEERING DATA (Page 2)

4. Does the application propose to correct previous site coordinates?
If Yes, list old coordinates.

☐ Yes ☒ No

Latitude	N/A °	Longitude	N/A °
----------	-------	-----------	-------

5. Has the FAA been notified of the proposed construction?

☐ Yes ☒ No

If Yes, give date and office where notice was filed and attach as an Exhibit a copy of FAA determination, if available. Not required under part 17

Exhibit No.
N/A

Date N/A Office where filed N/A

6. List all landing areas within 8 km of antenna site. Specify distance and bearing from structure to nearest point of the nearest runway.

	Landing Area	Distance (km)	Bearing (degrees True)
	Hafer Petroleum(HP)	1.54	334.6
(a)	Arnold	2.57	154.4
	Penske (HP)	6.04	325.9
(b)	Reading Hospital (HP)	6.64	316.2
	Reading Hosp. & Medic. (HP)	7.11	313.8

7. (a) Elevation: (to the nearest meter)

(1) of site above mean sea level; 256 meters

(2) of the top of supporting structure above ground (including antenna, all other appurtenances, and lighting, if any); and 61 meters

(3) of the top of supporting structure above mean sea level $[(a)(1) + (a)(2)]$ 317 meters

- (b) Height of antenna radiation center: (to the nearest meter)

(1) above ground; 46 meters

(2) above mean sea level $[(a)(1) + (b)(1)]$; and 302 meters

(3) above average terrain. 153 meters

8. Attach as an Exhibit sketch(es) of the supporting structure, labelling all elevations required in Question 7 above, except item 7(b)(3). If mounted on an AM directional-array element, specify heights and orientations of all array towers, as well as location of TV radiator.

Exhibit No.
Fig. 1

9. Maximum visual effective radiated power 5000 kW

10. Antenna:

(a) Manufacturer Dielectric (b) Model No. TFU-34E

(c) Is a directional antenna proposed?

☐ Yes ☒ NoIf Yes, specify major lobe azimuth(s) N/A degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685.Exhibit No.
N/A

(d) Is electrical beam tilt proposed?

☒ Yes ☐ NoIf Yes, specify 0.5 degrees electrical beam tilt and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685.Exhibit No.
Fig. 2A, 2B
Stmt. A, 1b1

(e) Is mechanical beam tilt proposed?

☐ Yes ☒ NoIf Yes, specify N/A degrees mechanical beam tilt toward azimuth N/A degrees True and attach as an Exhibit all data specified in 47 C.F.R. Section 73.685.Exhibit No.
N/A

(f) The proposed antenna is: (check only one box)

☒ horizontally polarized ☐ circularly polarized ☐ elliptically polarized

11. Will the proposed facility satisfy the requirements of 47 C.F.R. Sections 73.685(a) and (b)?

☒ Yes ☐ No

If No, attach as an Exhibit justification therefor, including amounts and percentages of population and area that will not receive City Grade service.

Exhibit No.
N/A

12. Will the main studio be located within the station's predicted principal community contour as defined by 47 C.F.R. Section 73.685(a)?

☒ Yes ☐ No

If No, attach as an Exhibit justification pursuant to 47 C.F.R. Section 73.1125.

Exhibit No.
N/A13. Does the proposed facility satisfy the requirement of 47 C.F.R. Section 73.610?
(But see Statement B)☒ Yes ☐ No

If No, attach as an Exhibit justification therefor, including a summary of any previously granted waiver(s).

Exhibit No.
N/A14. Are there: (a) within 60 meters of the proposed antenna, any proposed or authorized FM or TV transmitters; or (b) in the general vicinity, any nonbroadcast *(except citizens band or amateur)* radio stations or any established commercial or government receiving stations?☒ Yes ☐ NoIf Yes, attach as an Exhibit a description of the expected, undesired effects of operations and remedial steps to be pursued, if necessary, and a statement accepting full responsibility for the elimination of any objectionable interference *(including that caused by intermodulation)* to facilities in existence or authorized prior to grant of this application. *(See 47 C.F.R. Sections 73.685(d) and (g).)*Exhibit No.
Stmt. C

15. Attach as an Exhibit a topographic map that shows clearly, legibly, and accurately, the location of the proposed transmitting antenna. This map must comply with the provisions of 47 C.F.R. Section 73.684(g). The map must further display clearly and legibly the original printed contour lines and data as well as latitude and longitude markings, and must bear a scale of distance in kilometers.

Exhibit No.
Fig. 3

SECTION V-C - TV BROADCAST ENGINEERING DATA (Page 4)

16. Attach as an Exhibit a map (Sectional Aeronautical Chart or equivalent) which shows clearly, legibly and accurately, and with the original printed latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.
Fig. 4

- (a) The proposed transmitter location, and the radials along which profile graphs have been prepared;
- (b) The City Grade, Grade A and Grade B predicted contours; and
- (c) The legal boundaries of the principal community to be served.

17. Specify area in square kilometers (1 sq. mi. = 259 sq. km.) and population (latest census) within the predicted Grade B contour.

Area 14,925 sq. km. Population 4,066,085 (1990 Census)

18. For an application involving an auxiliary facility only, attach as an Exhibit a map (Sectional Aeronautical Chart or equivalent) that shows clearly, legibly, and accurately, and with latitude and longitude markings and a scale of distance in kilometers:

Exhibit No.
N/A

- (a) The proposed auxiliary Grade B contour; and
- (b) The Grade B contour of the licensed main facility for which the applied-for facility will be the auxiliary.

(Main facility license file number N/A)

19. Terrain and Coverage Data (To be calculated in accordance with 47 C.F.R. Section 73.684.)

Source of terrain data: (check only one box below)

☒ Linearly interpolated 30-second database (Source: NGDC TPG-0050)

☐ 7.5 minute topographic map

☐ Other (briefly summarize)

Radial bearing (degrees True)	Height of radiation center above average elevation of radial from 3 to 16 km (meters)	Predicted Distances		
		To the City Grade Contour (kilometers)	To the Grade A Contour (kilometers)	To the Grade B Contour (kilometers)
340 *	207.4	49.8	58.3	73.3
0	95.6	40.6	49.0	63.3
45	180.2	48.1	56.5	71.0
90	228.0	51.1	59.7	75.1
135	134.4	44.6	52.9	67.2
180	118.3	43.2	51.6	65.8
225	129.3	44.2	52.5	66.8
270	123.0	43.6	52.0	66.2
315	213.5	50.2	58.7	73.9

*Radial through principal community, if not one of the major radials. This radial should NOT be included in calculation of HAAT.

20. Environmental Statement (See 47 C.F.R. Section 1.1301 et seq.)

Would a Commission grant of this application come within 47 C.F.R. Section 1.1307, such that it may have a significant environmental impact?

☐ Yes ☒ No

If you answer Yes, submit as an Exhibit an Environmental Assessment required by 47 C.F.R. Section 1.1311.

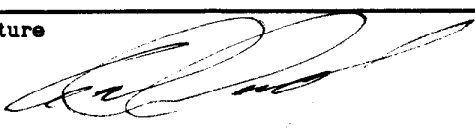
Exhibit No.
N/A

If No, explain briefly why not.

Proposal maybe categorically excluded from enviromental processing; See statement D

CERTIFICATION

I certify that I have prepared this Section of this application on behalf of the applicant, and that after such preparation I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

Name (Typed or Printed)	Relationship to Applicant (e.g., Consulting Engineer)
Garrison C. Cavell	Consultant
Signature	Address (Include ZIP Code)
	Suffa and Cavell, Inc. 10300 Eaton Place, Suite 450 Fairfax, VA 22030
Date	Telephone No. (Include Area Code)
June 29, 1994	(703) 591-0110

Site Coordinates
40° 17' 15" N
75° 53' 45" W

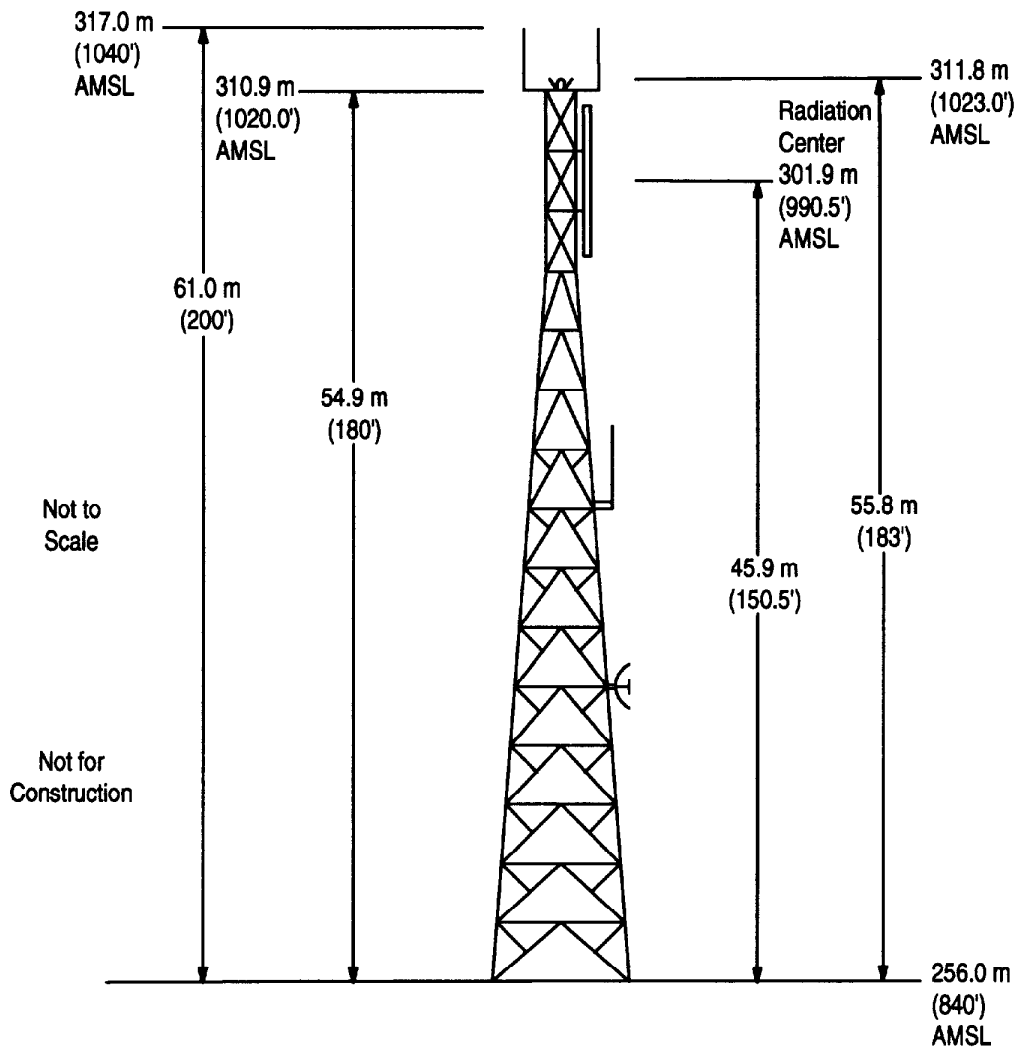


FIGURE 1
ANTENNA SYSTEM ELEVATION PLAN

prepared June 1994 for
Adams Communications Corporation
Reading, Pennsylvania

Ch 51 5000 kW 153 m

Suffa and Cavell, Inc.
Consulting Engineers - Fairfax, VA

Statement A
Proposed Antenna System
prepared for
Adams Communications Corporation
Reading, Pennsylvania
Channel 51 5000 kW 153 m

The described operation will employ a *Dielectric Communications* model TFU-34E antenna which will be non-directional in the horizontal plane. **Figures 2A and 2B** present the theoretical elevation pattern of the proposed antenna system. As shown, 0.5° of electrical beam tilt is being specified. **Table I** provides a tabulation of the elevation pattern relative field at the pertinent depression angle, along with elevation and contour data.

The antenna system will be installed in accordance with the manufacturer's instructions, said installation being supervised on-site by a competent technical representative of the applicant.

DIELECTRIC

GS

Proposal Number

Date

June 28, 1994

Call Letters

Channel

Location

Customer

Antenna Type

TFU-34E

ELEVATION PATTERN

RMS Gain at Main Lobe 30.0

14.77 dB

Beam Tilt

0.50 deg

RMS Gain at Horizontal 22.4

13.50 dB

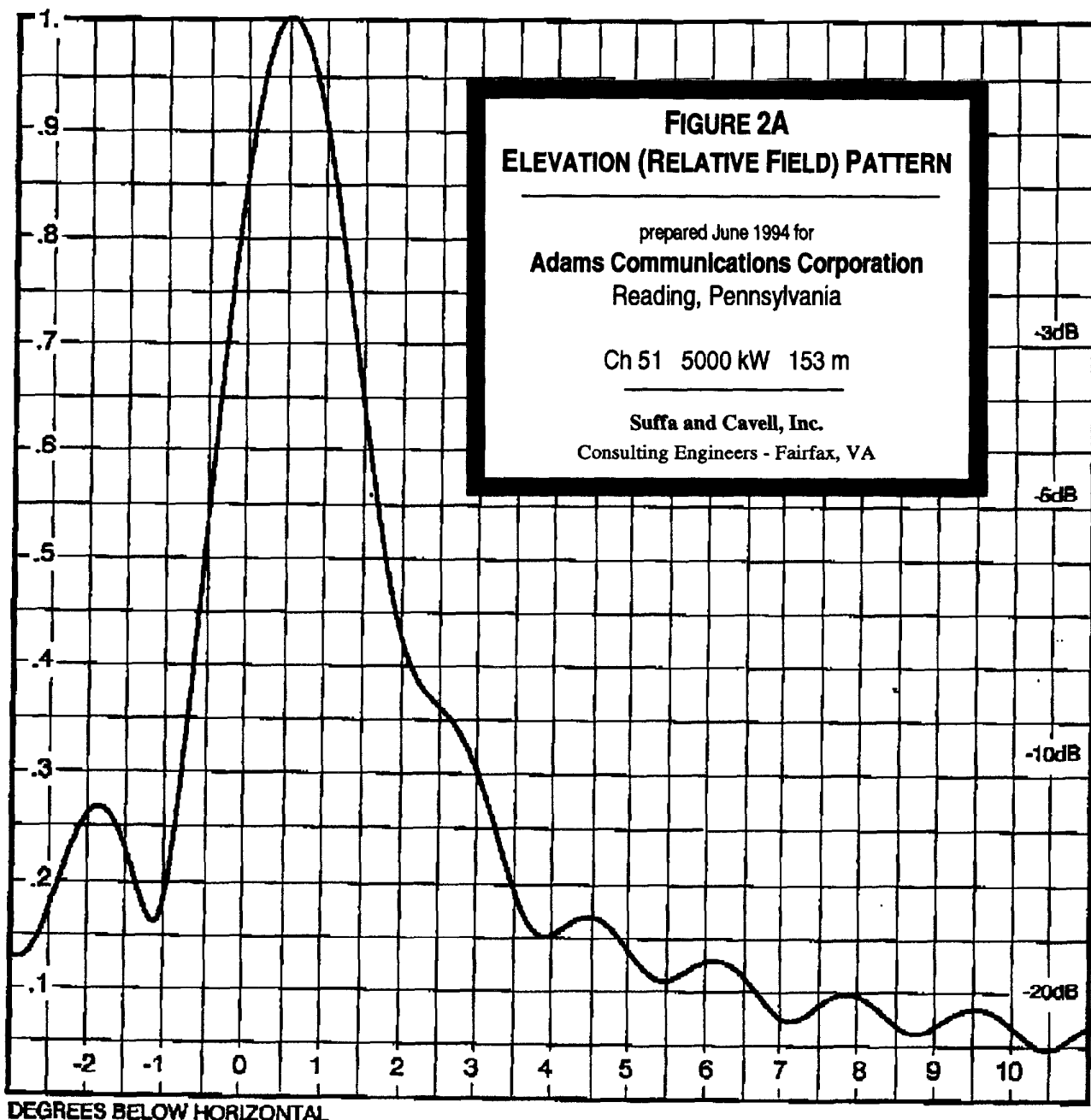
Frequency

Calculated/Measured

Calculated

Drawing #

34E300050-90



DIELECTRIC COMMUNICATIONS

RAYMOND, ME TEL 207-855-4555 FAX 207-855-7120
VOORHEES, NJ TEL 609-435-3200 FAX 609-435-3204

DIELECTRIC



Proposal Number

Date

June 28, 1994

Call Letters

Channel

Location

Customer

Antenna Type

TFU-34E

ELEVATION PATTERN

RMS Gain at Main Lobe 30.0

14.77 dB

Beam Tilt

0.50 deg

RMS Gain at Horizontal 22.4

13.50 dB

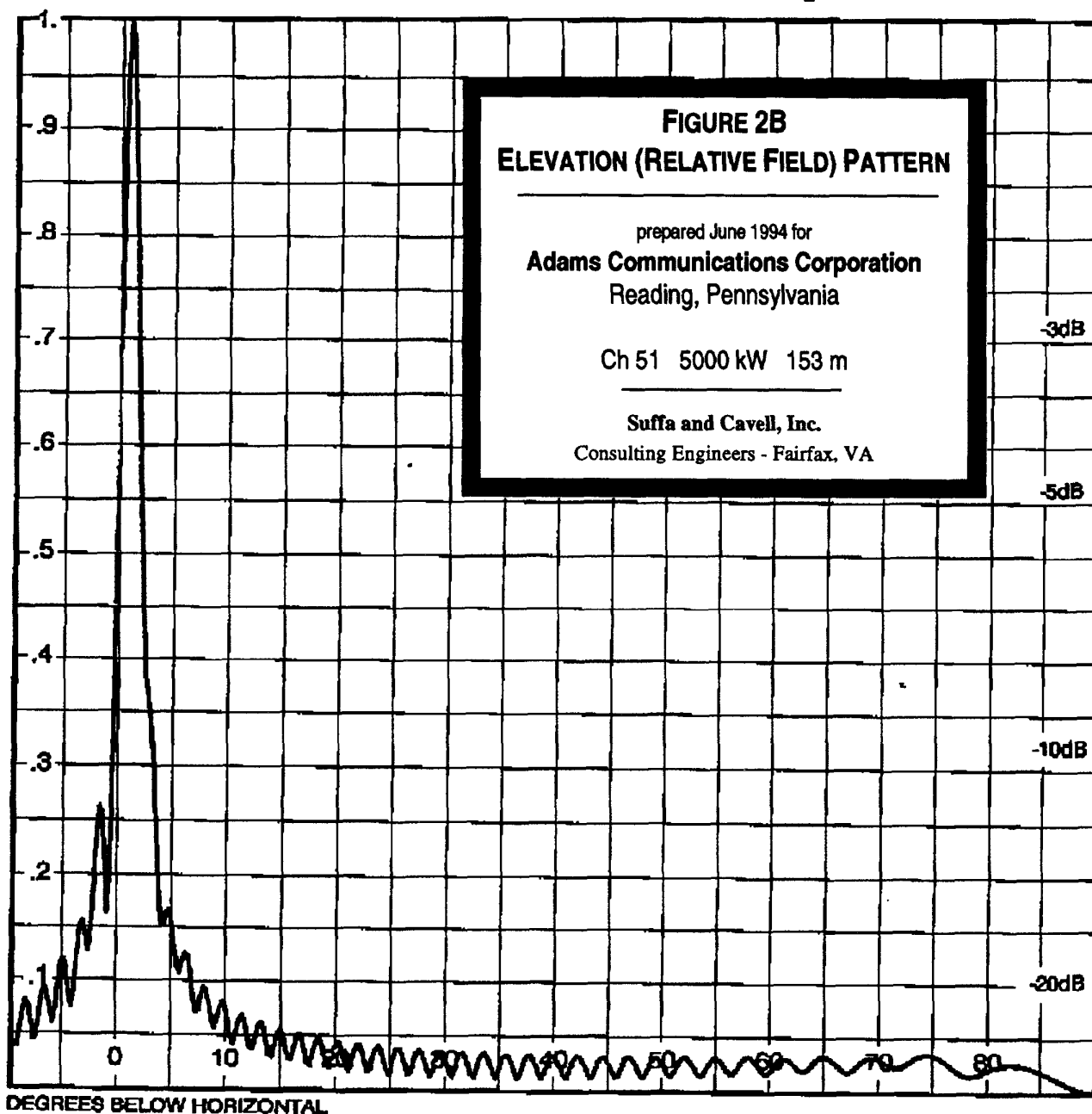
Frequency

Calculated/Measured

Calculated

Drawing #

34E300050-90



DIELECTRIC COMMUNICATIONS

RAYMOND, ME TEL 207-955-4556 FAX 207-955-7126
VOORHEES, NJ TEL 609-438-3200 FAX 609-435-3204

Table I
Elevation and Contour Data
Adams Communications Corporation
Reading, Pennsylvania
Channel 51 5000 kW 153 m

Azimuth (degrees T)	Average Elevation (m)	Effective Height (m)	Depression Angle (Deg)	E Plane Rel. Field At Depr. Angle	ERP (kw)	ERP (dBk)	City Grade 80 dBu (km)	Grade A 74 dBu (km)	Grade B 64 dBu (km)
0	206.3	95.6	0.27	0.970	5000	36.99	40.6	49.0	63.3
45	121.7	180.2	0.37	0.992	5000	36.99	48.1	56.5	71.0
90	73.9	228.0	0.42	0.997	5000	36.99	51.1	59.7	75.1
135	167.5	134.4	0.32	0.983	5000	36.99	44.6	52.9	67.2
180	183.6	118.3	0.30	0.976	5000	36.99	43.2	51.6	65.8
225	172.6	129.3	0.31	0.978	5000	36.99	44.2	52.5	66.8
270	178.9	123.0	0.31	0.978	5000	36.99	43.6	52.0	66.2
315	88.4	213.5	0.40	0.994	5000	36.99	50.2	58.7	73.9
340 City	94.5	207.4	0.40	0.994	5000	36.99	49.8	58.3	73.3

Elevation of Average Terrain:	149.1	meters
Antenna Height Above Average Terrain:	152.8	meters
Antenna Height Above Mean Sea Level:	301.9	meters
Effective Radiated Power:	5000	kilowatts

Statement B
Allocation Considerations
prepared for
Adams Communications Corporation
Reading, Pennsylvania
Channel 51 5000 kW 153 m

The site specified by *Adams Communications Corporation* ("Adams") meets all of the inter-station separation requirements of Section 73.610 of the FCC Rules with respect to all authorized full service facilities except with respect to the existing operation of WTVE (TV), Reading, Pennsylvania. (WTVE is licensed to Reading Broadcasting, Inc.) Since this application is mutually exclusive with the license renewal of WTVE, that facility need not be considered; a grant of this application, which would simultaneously terminate the license of Reading Broadcasting, Inc., would make the allocation conflict moot.

Two other matters warrant discussion. First, in the Advanced Television proceeding freeze order,¹ the Commission imposed a "freeze" on the acceptance of applications for construction permit for new television stations on vacant allotments within certain areas where the density of existing television stations left relatively limited spectrum available for new technologies. The Reading area is within such a "freeze zone". However, since Channel 51 in Reading, Pennsylvania is presently occupied by WTVE, it is not a "vacant allotment", within the meaning of the Advanced Television (ATV) freeze order. Consequently, the instant application is believed to be acceptable for filing.

It should also be noted in this regard, that the Commission has previously accepted television construction permit applications which were mutually exclusive

¹ Advanced Television Systems and Their Impact on the Existing Television Service, Order, RM-5811 (Mimeo No. 4074 released July 17, 1987).

Statement B (continued)
Allocation Considerations

with television license renewal applications in the top 30 markets², notwithstanding the ATV freeze. (See e.g. Trinity Broadcasting of Florida, Inc., 8 FCC Rcd 2475 (1993), in which the full Commission designated for hearing the October 1991 application of Trinity Broadcasting of Florida, Inc. for renewal of license of television station WHFT(TV), Miami, Florida, and the competing application (filed December 27, 1991) of Glendale Broadcasting Co. Both applications were filed following the issuance of the Commission's ATV freeze order.)

The proposed site is also "short-spaced" to certain existing or proposed LPTV/TV Translator facilities. However, inasmuch as LPTV/TV Translator stations are classified as "secondary" services, they are not afforded protection from full-service facilities. Specifically, Section 74.702(b) of the FCC Rules states that authorizations for the construction of (or changes in the facilities of existing) full service television stations may be made without regard to existing or proposed LPTV or TV Translator stations. Furthermore, any such "impacted" LPTV operation must take steps to eliminate any interference caused to the full powered station, even if it was caused by the modification of the full service facility. Accordingly, this application may be granted without regard to any "Part 74" operations.

² Reading is part of the Philadelphia ADI (ie: *Allentown-Bethlehem-Philadelphia & Reading, PA; Atlantic City-Vineland-Wildwood, NJ; Wilmington, DE*), which is market "number 4".

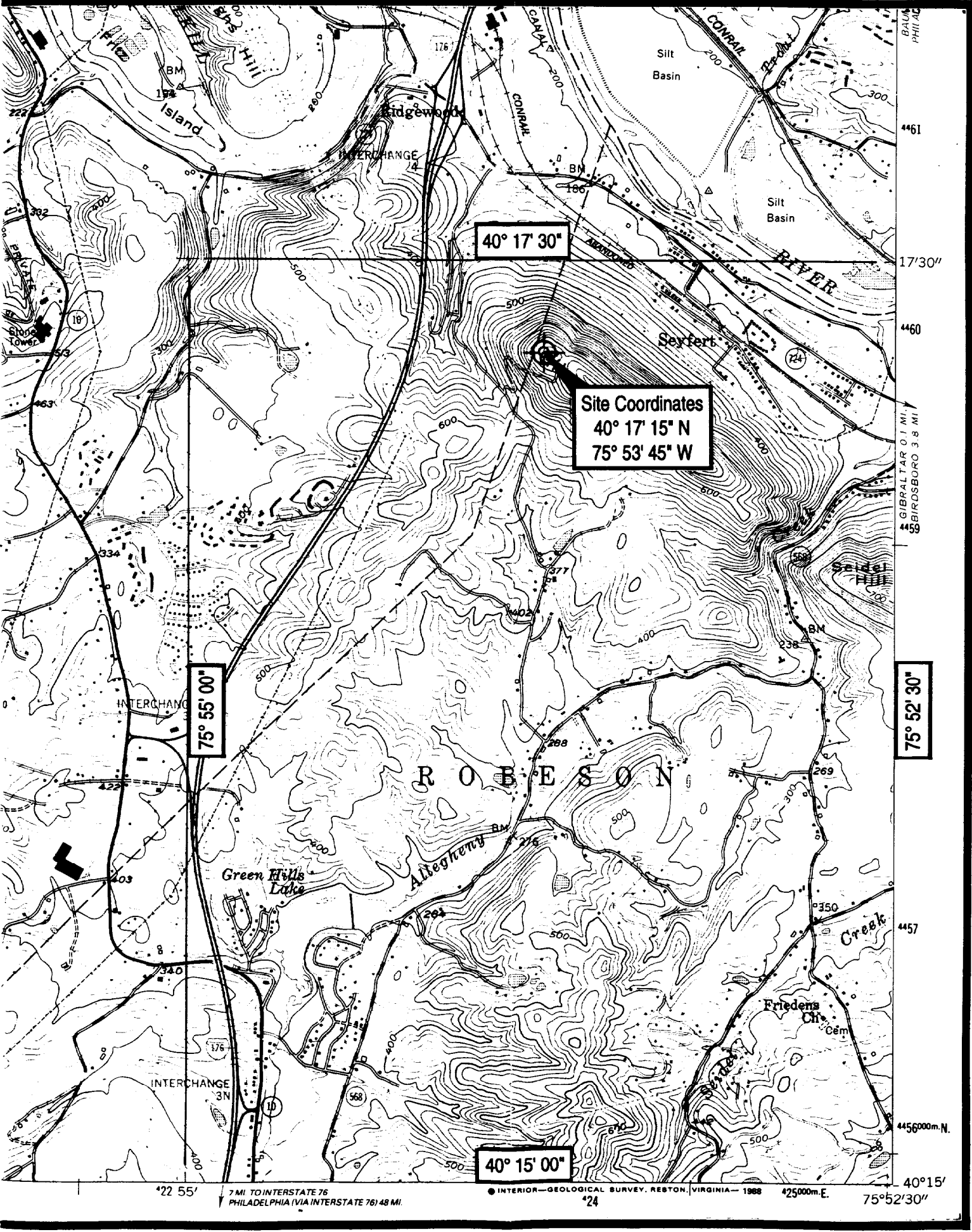
Statement C
Interference Considerations
prepared for
Adams Communications Corporation
Reading, Pennsylvania
Channel 51 5000 kW 153 m

Adams Communications Corporation ("*Adams*") is proposing the construction of a new transmitting facility in a relatively unpopulated area . There are no known proposed or authorized FM or TV transmitters located within 60 meters of the selected location. There are several non-broadcast radio stations, established commercial, or government receiving stations within the general vicinity of the proposed site.

The nearest known FCC Monitoring station is 147 km distant at Laurel, Maryland. There are no AM broadcast stations located within 2 miles of the proposed site.

As discussed in the Commission's Rules, present information is not sufficient to establish "blanketing areas" of television broadcast stations. However, since it is also believed that there is little population located around the proposed site, and given the elevation pattern of the proposed antenna system, it is believed that there should be few instances of "blanketing interference" near this site.

Nevertheless, *Adams* acknowledges its responsibility for the mitigation of reasonable complaints arising from excessively strong signals as required under the Rules. *Adams* also acknowledges its responsibility for the elimination of objectional interference to facilities which are either existing or were authorized prior to a grant of the this application to the extent required by the Rules. Mitigative measures to be employed for any instance of interference may include, but are not necessarily limited to, the installation of filters or traps where appropriate.



40° 17' 30"

Site Coordinates
40° 17' 15" N
75° 53' 45" W

75° 55' 00"

75° 52' 30"

40° 15' 00"

42° 55'

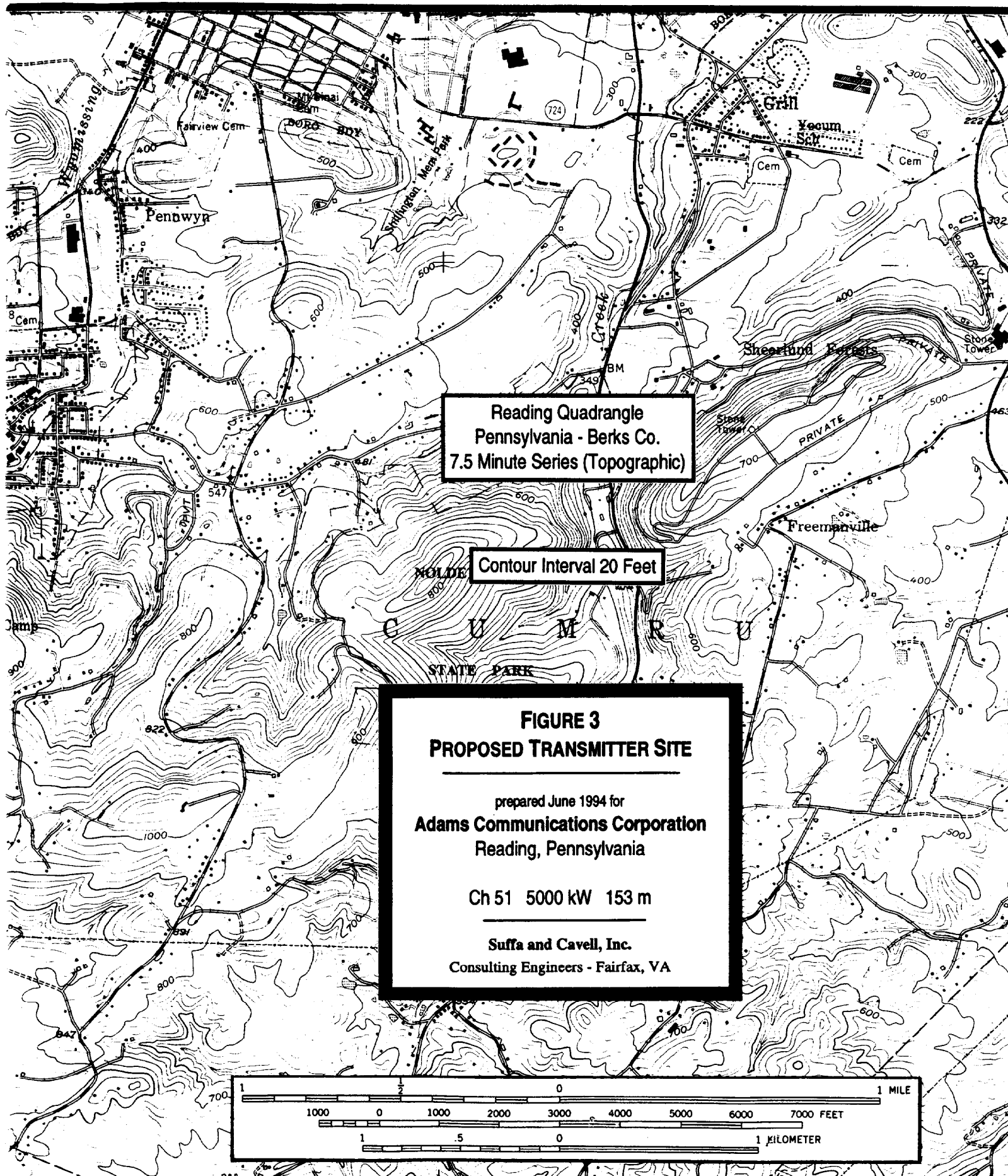
7 MI. TO INTERSTATE 76
PHILADELPHIA (VIA INTERSTATE 76) 48 MI.

● INTERIOR—GEOLOGICAL SURVEY, RESTON, VIRGINIA—1988 425000m.E.

24

40° 15'
75° 52' 30"

4461
17° 30"
4460
GIBRALTAR 0.1 MI.
4559
BIROSBORO 3.8 MI.
4457
4456000m.N.



Coverage within Grade B contour:
 Area (sq km) 14,925
 Population(1990 Census) 4,066,085



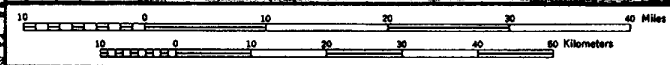
**FIGURE 4
 PREDICTED COVERAGE CONTOURS**

prepared June 1994 for
Adams Communications Corporation
 Reading, Pennsylvania

Ch 51 5000 kW 153 m

Suffa and Cavell, Inc.
 Consulting Engineers - Fairfax, VA

Pennsylvania, New Jersey,
 Delaware and Maryland
 1:1,000,000



Statement D
Environmental Considerations
prepared for
Adams Communications Corporation
Reading, Pennsylvania
Channel 51 5000 kW 153 m

This application proposes to side-mount an omnidirectional Channel 51 antenna on an existing tower in an existing "electronics" site. No change in overall structure height will be necessary. Under Note 1 to Section 1.1306, use of an existing structure is environmentally desirable. Additionally, based upon information provided by the applicant, it is believed that the provisions of 1.1307(a)(1-7) do not apply in this case for the following reasons:

Specifically, the proposed site location is not within an officially designated wilderness area or wildlife preserve. It is believed that the proposed construction will not disturb any endangered or threatened species or designated critical habitats, nor does it appear likely that said construction will jeopardize the continued existence of any proposed endangered or threatened species. No destruction or adverse modification of proposed critical habitats, as determined by the Secretary of the Interior pursuant to the Endangered Species Act of 1973, will occur. The proposed facilities would not affect districts, sites, buildings structures, or objects significant in American history, architecture, archaeology, engineering or culture that are listed in, or eligible for listing in the National Register of Historic Places. The site is not located near nor will it affect known Indian religious sites. The proposed transmitter location is not in a designated flood plain. The site is understood to be substantially cleared; thus, it is not anticipated that significant changes in surface features will be required (e.g., wetland fill or water diversion). Furthermore, no changes to the existing marking and lighting specifications are being proposed herein. (The installation of high intensity lighting, as described under 1.1307(a)(8), is not expected to be imposed by the Federal Aviation Administration.) Therefore, the proposed site may be categorically excluded from environmental consideration and preparation of an Environmental Assessment is not required.

Statement D (Page 2 of 4)
Environmental Considerations

Human Exposure to Radiofrequency Radiation

A new antenna system, manufactured by Dielectric Communications, will be side mounted on the existing tower as schematically illustrated in the sketch of **Figure 1**. It will be non-directional in the horizontal plane, and will employ horizontal polarization and electrical beam tilt as discussed in Statement A and the attached Figures and Tables.

Pursuant to §1.1307(b), the proposed operation has been evaluated for human exposure to radiofrequency energy using the procedures outlined by the Federal Communications Commission in FCC OST Bulletin No. 65 (OST 65). OST 65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines adopted in the ANSI guideline limits.¹ Under Commission policy, a facility may be presumed to comply with the ANSI guideline if it satisfies the exposure criteria set forth in OST 65.

Based upon that methodology, and as demonstrated in the following, it is believed that the proposed transmitting system will comply with the adopted guidelines for human exposure to RF radiation of ANSI C95.1-1982.

Specifically, Equation #5 on page 13 of OST 65 was used to compute the power density contribution from the proposed Channel 51 operation based upon the following assumptions: Horizontal polarization only, a radiation center located at 45.9 meters above the ground, a proposed peak Visual Effective Radiated Power (ERP) of 5000 kilowatts, an Aural ERP of 10% of the peak visual carrier power (or 500 kilowatts), and a relative vertical (elevation) field factor of 0.10.

¹ The "Radio Frequency Protection Guides" recommended in *"American National Standard Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 300 kHz to 100 GHz"* (ANSI C95.1-1982), issued by the American National Standards Institute (ANSI), have been adopted by the FCC as the maximum allowable exposure level for humans in the vicinity of transmitting antennas.

Statement D (Page 3 of 4)
Environmental Considerations

Using a vertical field factor of 0.10 is believed to be conservative and appropriate for an antenna of this type since, as demonstrated by **Figure 2B**, the magnitude of the actual elevation pattern is less than 10% field in the downward direction (from about 7° below the horizontal plane to -90°).

Based upon these assumptions, the calculated power density contribution would be 396.45 $\mu\text{W}/\text{cm}^2$ at ground level. This is approximately 17.1 percent of the ANSI limit (of 2,316.67 $\mu\text{W}/\text{cm}^2$) at the Channel 51 center frequency.

No other stations of any kind, other than "non-contributory" low power microwave systems or intermittent duty communications equipment are presently in use at or near the designated site. Hence, the contribution of these facilities at the proposed site was not considered in the instant analysis.

General Public and Worker Safety

As demonstrated in the preceding, excessive levels of RF energy will not be present at ground level near the proposed supporting structure. Consequently, members of the general public will not be exposed to RF levels in excess of the ANSI guidelines as a result of a grant of this application. Nonetheless, the supporting tower will be secured to limit public access and appropriate RF warning signs will be posted.

With respect to worker safety at the proposed site, it is believed that based on the supplied analysis, excessive exposure would not occur in normally accessible areas on the ground. With respect to situations when work must be performed on the tower, a site exposure policy encompassing all tower users will be adopted to protect maintenance workers from excessive exposure when work must be performed in areas on the tower where high RF levels are expected to be present. Protective measures

Statement D (Page 4 of 4)
Environmental Considerations

to be employed under this policy may include, but will not be limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of the facility when work or inspections must be performed in areas where the exposure guidelines will be exceeded. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas.

Since this hilltop is an existing "electronics site", consideration was also given to the possible exposure of tower workers on adjoining towers. A "worst case" assumption of 100% field was employed to determine the horizontal distance from the proposed antenna where RF levels of greater than 100% of the present ANSI limit would occur. Using the previously described methodology, RF levels in excess of the present ANSI limit are predicted to occur at distances of less than 190 meters from the proposed antenna. Based upon a database check of authorized towers, three other communications towers are located on this hilltop within that distance. Hence, under a worst case theoretical analysis (ignoring the actual vertical angle to the adjoining tower), the proposed operation could potentially expose workers on these neighboring towers to RF levels in excess of the ANSI limit. Accordingly, *Adams Communications Corporation* will adopt a hilltop site exposure policy encompassing all tower users within 190 meters to protect maintenance workers from excessive exposure when work must be performed in above ground areas on nearby towers where high RF levels are expected to be present. (RF exposure measurements may be also employed to refine the area of concern.) The previously described protective measures will be employed for the entire hilltop coordination zone.

Conclusion

It is believed that this proposal may be categorically excluded from environmental processing under Section 1.1306 of the Rules.

Statement E
Emergency Power
prepared for
Adams Communications Corporation
Reading, Pennsylvania
Channel 51 5000 kW 153 m

Adams Communications Corporation will employ emergency power generating equipment at the studio and transmitter site to ensure uninterrupted service in the event of a commercial power outage.